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BANK OF AMERICA CORPORATION;  
BANK OF AMERICA, N.A., for itself and  
as successor by merger to Countrywide  
Bank, FSB; COUNTRYWIDE  
FINANCIAL CORPORATION; and  
COUNTRYWIDE HOME LOANS, INC.

[ADDITIONAL COUNSEL IN SIGNATURE BLOCK]

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

CITY OF LOS ANGELES, a municipal  
corporation,

Plaintiff,

v.

BANK OF AMERICA  
CORPORATION; BANK OF  
AMERICA, N.A.; COUNTRYWIDE  
FINANCIAL CORPORATION;  
COUNTRYWIDE HOME LOANS; and  
COUNTRYWIDE BANK, FSB,

Defendants.

Case No. 2:13-cv-09046-PA-AGR

**NOTICE OF MOTION AND  
MOTION OF DEFENDANTS BANK  
OF AMERICA CORPORATION  
AND BANK OF AMERICA, N.A.  
(FOR ITSELF AND AS SUCCESSOR  
BY MERGER TO COUNTRYWIDE  
BANK, FSB) FOR SUMMARY  
JUDGMENT ON STATUTE OF  
LIMITATIONS**

Date: May 11, 2015  
Time: 1:30pm  
Courtroom: 15  
Judge: Hon. Percy Anderson

Complaint filed: December 6, 2013

Filed concurrently with the following:

1. Memorandum of Points and Authorities;
2. Separate Statement of Undisputed Facts and Conclusions of Law;
3. Declaration of David Steckel;
4. Declaration of Nicole Patterson;
5. Declaration of Steven Ellis; and
6. Proposed Judgment

1           **NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT**  
2           **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

3           PLEASE TAKE NOTICE that on Monday, May 11, 2015 at 1:30 p.m., or as  
4 soon thereafter as counsel may be heard, in Courtroom 15 at the United States  
5 Courthouse located at 312 North Spring Street Los Angeles, CA 90012-4701,  
6 Defendants BANK OF AMERICA CORPORATION and BANK OF AMERICA,  
7 N.A. (for itself and as successor by merger to Defendant COUNTRYWIDE BANK,  
8 FSB) (collectively "Defendants") will and hereby do move for summary judgment on  
9 all claims asserted in Plaintiff CITY OF LOS ANGELES' Complaint pursuant to  
10 Federal Rule of Civil Procedure 56. This motion is made on the grounds that there is  
11 no genuine issue as to any material fact as to Defendants' statute of limitations  
12 defense and that Defendants are entitled to judgment as a matter of law.

13           This motion is made based on this Notice of Motion and Motion; the  
14 concurrently filed Memorandum of Points and Authorities in Support of Motion for  
15 Summary Judgment, Separate Statement of Undisputed Facts and Conclusions of  
16 Law, and Declarations of David Steckel, Nicole Patterson, and Steven Ellis; and all  
17 pleadings, records, and papers on file in this action; and such other written or oral  
18 arguments as may be presented to the Court at or before the hearing on this Motion.

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Pursuant to Local Rule 7-3, counsel for Defendants conferred with counsel for Plaintiffs regarding this motion on March 23, 2015. The parties were unable to reach agreement.

Respectfully submitted,

Dated: March 30, 2015

By: /s/ Steven A. Ellis  
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